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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEREMI FAJARDO,

Defendant.

Case No. 2:18-cr-00363-JAD-EJY

**STIPULATION TO CONTINUE RESPONSE
TO FILED MOTION**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. 4.
Trutanich, United States Attorney, and Brian Whang, Assistant United States Attorney,
counsel for the United States of America, and Richard Tanasi, counsel for Jeremi Fajardo,
that the due date for the Government's Response to Defendant's Motion to Suppress, filed
on January 8, 2021, be extended fourteen (14) days from January 22, 2021 to February 5,
2021.

This Stipulation is entered into for the following reasons:

1. Counsel for the government needs additional time to respond to Defendant's
Motion to Suppress filed on January 8, 2021.

2. The government filed a motion to dismiss the indictment on January 19,

2021, which may be dispositive of Defendant's motion.

3. The parties agree to the continuance.

4. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

5. This is the first stipulation to be filed herein.

DATED this 22nd day of January, 2021.

NICHOLAS A. TRUTANICH,
United States Attorney

By: /s/ Brian Y. Whang
BRIAN Y. WHANG
Assistant United States Attorney

By: /s/ Richard Tanasi
RICHARD TANASI
Counsel for Jeremi Fajardo

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

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Defendant.

Case No. 2:18-cr-00363-JAD-EJY

ORDER

FINDINGS OF FACT

1. Counsel for the government needs additional time to respond to Defendant's Motion to Suppress filed on January 8, 2021.

2. The government filed a motion to dismiss the indictment on January 19, 2021, which may be dispositive of Defendant's motion.

3. The parties agree to the continuance.

4. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

5. This is the first stipulation to be filed herein.

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4 **ORDER**

5 IT IS THEREFORE ORDERED that the Government herein shall have to and
6 including February 5, 2021, to file any and all Responses to Defendant's Motion to Suppress.
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8 DATED this 22nd day of January, 2021.

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11 **UNITED STATES MAGISTRATE JUDGE**
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